Proposed Amendment to the Environmental Cooperative Agreement between Packaging Corporation of America and Wisconsin Department of Natural Resources

This Proposed Amendment is an addition to the September 10, 2002, Environmental Cooperative Agreement (Agreement) between Packaging Corporation of America (PCA) and Wisconsin Department of Natural Resources (DNR). Both the original Agreement and this Proposed Amendment were developed under Wisconsin's Environmental Cooperation Pilot Program pursuant to Section 299.80, Wis. Statutes.

- PCA will be allowed to reduce BOD_5 monitoring from daily to once weekly (Wednesday analysis) between November 1 and April 30. BOD_5 will be analyzed twice weekly (Wednesday/Friday) from May 1 to October 31. Monitoring will occur on a daily basis during periods between May 1 and October 31 whenever:

  (a) The Wisconsin River is ≤ 1600 cfs and river temperature > 26.7°C
  (b) The Wisconsin River flows is ≤ 1200 cfs and river temperature > 23.4°C
  (c) The Wisconsin River flow is ≤ 800 cfs and the river temperature > 20.1°C

- Daily monitoring will be conducted during unusual events (e.g., a spill) that could impact the treatment system performance.

- If there is a BOD_5 effluent limit violation, daily monitoring will resume for a period of two years.

- PCA will conduct weekly COD analyses on raw mill effluent, the anaerobic basin discharge, and the final effluent for a period of one year. Samples will be collected on Wednesdays to accommodate BOD_5/COD data correlation. A report that evaluates COD reduction across the WTP as well as the statistical relationship (if any) between COD and BOD_5 in the influent and final discharges will be submitted to WDNR on a quarterly basis (within 30 days of the conclusion of each quarter). After 1 year of the COD monitoring, the data collected will be evaluated and an appropriate monitoring plan will be determined.

- PCA will evaluate existing micronutrient concentrations in the anaerobic digester supernatant with a specific focus on iron, nickel and cobalt. Baseline concentrations will be compared against (recommended) published literature concentrations. If deficiencies are noted, PCA will add supplemental dosages of the appropriate micronutrients and evaluate the impact of micronutrient supplementation on COD reduction efficiency, biogas generation rate, and biosolids settleability. PCA will issue a report to WDNR summarizing its findings by June 30, 2005.

- PCA will conduct an on-site trial of a FAN Separator dewatering device to determine what, if any, benefit the technology may have in augmenting existing WTP residuals dewatering capability. If the results of the trial are favorable, PCA will evaluate the feasibility of installing a FAN Separator device. PCA will issue a report to WDNR summarizing its findings by June 30, 2004.

- PCA will evaluate the value and feasibility of installing insulation on the exterior walls of the anaerobic basins as a means of attenuating the variation in operating temperature associated with seasonal changes.

- In cooperation with the PCA Colby Boxplant, Tomahawk Mill will explore the feasibility of eliminating the practice of receiving copper-contaminated wastewater from the Colby Boxplant via ink product substitution.

IN WITNESS WHEREOF, the parties by their signatures shall cause this Agreement Amendment to be executed on the date specified.

Signed for and on behalf of:

STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES

By: _____ Date:_____
Scott Hassett
Secretary

Signed for and on behalf of:

PACKAGING CORPORATION OF AMERICA

By: _____ Date:_____
Bruce Ridley
Mill Manager